REMARKS

In the non-final Office Action, the Examiner rejects claims 1, 2, 16, 19, and 21 under 35 U.S.C. § 102(e) as anticipated by ASADA et al. (U.S. Patent No. 6,570,976); rejects claims 3-6, 14, 15, 17, 18, and 20 under 35 U.S.C. § 103(a) as unpatentable over ASADA et al. in view of KUNG et al. (U.S. Patent No. 6,252,952); rejects claims 7 and 8 under 35 U.S.C. § 103(a) as unpatentable over ASADA et al. in view of MURPHY (U.S. Patent No. 6,754,224); and rejects claims 9-12 under 35 U.S.C. § 103(a) as unpatentable over ASADA et al. in view of KUNG et al., and further in view of MURPHY. Applicant respectfully traverses these rejections.

By the present amendment, Applicant adds new claims 22-25. No new matter has been added by way of the present amendment. Claims 1-12 and 14-25 are pending.

Claims 1, 2, 16, 19, and 21 stand rejected under 35 U.S.C. § 102(e) as allegedly anticipated by ASADA et al. Applicant respectfully traverses this rejection.

A proper rejection under 35 U.S.C. § 102 requires that a single reference teach every aspect of the claimed invention either explicitly or impliedly. Any feature not directly taught must be inherently present. See M.P.E.P. § 2131. ASADA et al. does not disclose or suggest features of claims 1, 2, 16, 19, and 21.

For example, independent claim 1 is directed to a hybrid type telephony system capable of establishing a connection between conventional type telephone sets contained in an exchange unit and LAN type telephone sets contained in an IP network. The system includes a gateway circuit connected between the exchange unit and the IP network and performing voice data format conversion; and a central control unit

connected to a LAN of the IP network for establishing a communication path to the exchange unit via a control bus, controlling switching of IP packets of the IP network, managing IP address information of the LAN type telephone sets and the gateway circuit via the LAN, and controlling connection between the LAN type telephone sets and connection between the LAN type telephone sets and the gateway circuit. The control bus forms a communications path for enabling the central control unit to control a time-division switch for the conventional type telephone sets and an IP switch for the LAN type telephone sets. ASADA et al. does not disclose or suggest this combination of features.

For example, ASADA et al. does not disclose or suggest a control bus that forms a communications path for enabling the central control unit to control a time-division switch for the conventional type telephone sets and an IP switch for the LAN type telephone sets. The Examiner relies on ASADA et al.'s control unit 143 for allegedly corresponding to the recited central control unit and ASADA et al.'s bus 20 as allegedly corresponding to the recited control bus (Office Action, pg. 3). Applicant disagrees.

As illustrated in Fig. 8 of ASADA et al., control unit 143 is part of a router unit 14C, which connects to bus 20 via a bus interface 142. ASADA et al. in no way discloses or suggests that bus 20 allows control unit 143 to control a time-division switch for the conventional type telephone sets and an IP switch for the LAN type telephone sets, as recited in claim 1. In fact, ASADA et al.'s Fig. 8 does not even depict an IP switch. The Examiner does not point to any section of ASADA et al. that discloses control unit 143 connecting to an IP switch via bus 20. Therefore, a proper case of

anticipation has not been established with respect to claim 1.

Moreover, ASADA et al. does not disclose or suggest that control unit 143 connects to a time-division switch via bus 20, as also recited in claim 1. The Examiner relies on time switch 15 for allegedly corresponding to the recited time-division switch (Office Action, pg. 3). However, ASADA et al. does not disclose or suggest that control unit 143 connects to time switch 15 via bus 20. Instead, as clearly illustrated in Fig. 8, time switch 15 connects to bus 10 and not bus 20. Therefore, bus 20 cannot connect control unit 143 to time switch 15.

For at least the foregoing reasons, Applicant submits that claim 1 is not anticipated by ASADA et al.

Claim 16 depends from claim 1. Therefore, this claim is not anticipated by ASADA et al. for at least the reasons given above with respect to claim 1. Moreover, this claim recites additional features not disclosed or suggested by ASADA et al.

Claim 16 recites that the central control unit controls establishment of connections for all calls made between any two of the LAN type telephone sets, between any two of the conventional type telephone sets, and between any one of the LAN type telephone sets and any one of the conventional type telephone sets. The Examiner relies on col. 6, lines 15-30, of ASADA et al. for allegedly disclosing these features (Office Action, pg. 4). Applicant respectfully traverses.

At col. 6, lines 15-30, ASADA et al. discloses:

> The control unit 143 includes a controller 143A, a flash memory (a program memory) 143B, and a data memory (DRAM) 143C. The controller 143A processes various kinds of controls on the basis of programs stored in the program memory 143B, such as, for example,

> analysis of MAC addresses and IP addresses transmitted from the Ethernet interface adapter 143D.
>
> In addition, the control unit 143 has a PPP (point to point protocol) connecting function, which allows data terminals PC1-PCn connected to the LAN to be connected to the Internet IN and the intranet ITN via the ISDN public network NW. The control unit 143, which also has a routing table at the flash memory 143B, carries out the routing process of packets transmitted between the data terminals PC1-PCn and the ISDN public network NW, by referring to the routing table.

This section of ASADA et al. discloses that control unit 143 allows data terminals PC1-PCn to be connected to the Internet and the intranet ITN via the IDSN public network NW. This section of ASADA et al. in no way discloses or suggests that control unit 143 controls establishment of connections for all calls made between any two of the LAN type telephone sets, between any two of the conventional type telephone sets, and between any one of the LAN type telephone sets and any one of the conventional type telephone sets, as recited in claim 16.

For at least these additional reasons, Applicant submits that claim 16 is not anticipated by ASADA et al.

Independent claim 2 recites features similar to features recited above with respect to claim 1. Therefore, claim 2 is not anticipated by ASADA et al. for at least reasons similar to reasons given above with respect to claim 1.

Claim 19 depends from claim 2. Therefore, this claim is not anticipated by ASADA et al. for at least the reasons given above with respect to claim 2. Moreover, this claim recites additional features not disclosed or suggested by ASADA et al.

For example, claim 19 recites features similar to features described above with respect to claim 16. Therefore, claim 19 is not anticipated by ASADA et al. for at least

reasons similar to reasons given above with respect to claim 16.

Independent claim 21 is directed to a hybrid type telephony system. The system includes a time-division switch in which conventional type telephone sets are connected; an IP switch in which LAN type telephone sets are connected; a gateway circuit which performs converting between a first voice format to connect the conventional type telephone sets and a second voice format to connect the LAN type telephone sets; a LAN which connects the gateway circuit and the IP switch; a control bus which connects the time-division switch, the IP switch, and the gateway circuit; and a central control unit, connected to the LAN by way of the control bus, which establishes a communication path of the time-division switch, performs a switching control of IP packets in the IP switch, and controls the gateway circuit and manages IP address information of the LAN type telephone sets and the gateway circuit via the LAN, and which controls connection between the LAN type telephone sets and the gateway circuit. ASADA et al. does not disclose or suggest this combination of features.

For example, ASADA et al. does not disclose or suggest a control bus that connects a time-division switch, an IP switch, and a gateway and connects a central control unit to a LAN. The Examiner relies on ASADA et al.'s bus 20 as allegedly corresponding to the recited control bus, ASADA et al.'s time switch 15 as allegedly corresponding to the recited time-division switch, ASADA et al.'s router unit 14C as allegedly corresponding to the recited IP switch, ASADA et al.'s PCM processing unit 22 as allegedly corresponding to the recited gateway, and ASADA et al.'s control unit 143 as allegedly corresponding to the recited central control unit (Office Action, pp. 3-4).

Applicant respectfully disagrees.

As illustrated in Fig. 8 of ASADA et al., control unit 143 is part of a router unit 14C, which connects to bus 20 via a bus interface 142. ASADA et al. in no way discloses or suggests that control unit 143 connects to a LAN by way of bus 20, as recited in claim 1. Moreover, ASADA et al. does not disclose or suggest that router unit 14C is an IP switch. ASADA et al. does not disclose or suggest that router unit 14C performs switching.

In addition, even assuming, for the sake of argument, that ASADA et al.'s router unit 14C could reasonably be construed as an IP switch, ASADA et al. does not disclose or suggest that bus 20 connects time switch 15, router unit 14C, and PCM processing unit 22, as would be required by the Examiner's interpretation of claim 21. In fact, ASADA et al. does not disclose or suggest that time switch 15 connects to bus 20. Instead, as clearly illustrated in Fig. 8, time switch 15 connects to bus 10 and not bus 20. For at least these reasons, ASADA et al.'s bus 20 cannot reasonably be construed to correspond to the control bus recited in claim 21.

For at least the foregoing reasons, Applicant submits that claim 21 is not anticipated by ASADA et al.

Claims 3-6, 14, 15, 17, 18, and 20 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over ASADA et al. in view of KUNG et al. Applicant respectfully traverses this rejection.

Claims 3, 5, 14, 15, and 17 depend from claim 1. The disclosure of KUNG et al. does not remedy the deficiencies in the disclosure of ASADA et al. set forth above with

respect to claim 1. Therefore, claims 3, 5, 14, 15, and 17 are patentable over ASADA et al. and KUNG et al., whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 1.

Claims 4, 6, 18, and 20 depend from claim 2. The disclosure of KUNG et al. does not remedy the deficiencies in the disclosure of ASADA et al. set forth above with respect to claim 2. Therefore, claims 4, 6, 18, and 20 are patentable over ASADA et al. and KUNG et al., whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 2.

Claims 7 and 8 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over ASADA et al. in view of MURPHY. Applicant respectfully traverses this rejection.

Claim 7 depends from claim 1. The disclosure of MURPHY does not remedy the deficiencies in the disclosure of ASADA et al. set forth above with respect to claim 1. Therefore, claim 7 is patentable over ASADA et al. and MURPHY, whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 1.

Claim 8 depends from claim 2. The disclosure of MURPHY does not remedy the deficiencies in the disclosure of ASADA et al. set forth above with respect to claim 1. Therefore, claim 8 is patentable over ASADA et al. and MURPHY, whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 2.

Claims 9-12 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over ASADA et al. in view of KUNG et al., and further in view of MURPHY. Applicant

respectfully traverses this rejection.

Claims 9 and 11 depend from claim 1. The disclosures of KUNG et al. and MURPHY do not remedy the deficiencies in the disclosure of ASADA et al. set forth above with respect to claim 1. Therefore, claims 9 and 11 are patentable over ASADA et al., KUNG et al., and MURPHY, whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 1.

Claims 10 and 12 depend from claim 2. The disclosures of KUNG et al. and MURPHY do not remedy the deficiencies in the disclosure of ASADA et al. set forth above with respect to claim 2. Therefore, claims 10 and 12 are patentable over ASADA et al., KUNG et al., and MURPHY, whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 2.

New claims 22-25 recite features not disclosed or suggested by the art of record. For example, independent claim 22 is directed to a hybrid type telephony system that includes a first switch configured to perform time division switching of signals; a second switch configured to switch packets from a source to a destination; a gateway configured to convert signals to packets and forward the packets to the second switch, and convert packets from the second switch to signals and forward the signals to the first switch; and a control unit configured to control the first switch, the second switch, and the gateway via a control bus. The art of record does not disclose or suggest this combination of features.

Independent claim 23 is directed to a device that includes a time-division switch configured to process voice calls to and from a first type of telephone set; an Internet

Protocol (IP) switch configured to process voice calls to and from a second type of telephone set; a gateway circuit configured to convert signals between the first type of telephone set and the second type of telephone set; and a central control unit connected to the time-division switch, the IP switch, and the gateway via a control bus and being configured to manage the time-division switch, the IP switch, and the gateway to allow for voice communications between the first type of telephone set and the second type of telephone set. The art of record does not disclose or suggest this combination of features.

Claims 24 and 25 depend from claim 23. Therefore, these claims are allowable over the art of record for at least the reason given above with respect to claim 23.

In view of the foregoing amendments and remarks, Applicant respectfully requests the Examiner's reconsideration of this application, and the timely allowance of the pending claims.

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-1070 and please credit any excess fees to such deposit account.

Respectfully submitted,

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